

U.S. Department of Justice



United States Attorney
Eastern District of Missouri

Violent Crime Unit

LINDA LANE
Assistant United States Attorney

Thomas F. Eagleton U.S. Courthouse
111 South 10th Street, Rm. 20.333
St. Louis, Missouri 63102

Direct: (314) 539-2772
Office: (314) 539-2200
Fax: (314) 539-3887

July 15, 2019

VIA ELECTRONIC SERVICE

Mr. Robert Taaffe, Jr.
1015 Locust, Suite 725
St. Louis, Missouri 63101

In re: **Notice of intent to introduce expert witness testimony**
United States v. Steve Williams
Cause No. S1-4:18 CR 697 HEA

Dear Counsel:

Pursuant to the United States' notice of intent to introduce expert witness testimony mailed to you on July 22, 2019, please find enclosed herewith the curriculum vitas of Firearm Examiner Stephen Kramer.

Mr. Kramer is a firearms examiner for the Saint Louis County Police Department. His testimony may include, among other things: (1) his background and experience; (2) the make and model of the firearm seized in this case; (3) the origin of the firearm and its interstate nexus; (4) the contents of the firearm; and (5) that the firearm operates as designed. Mr. Kramer's curriculum vitae is available upon request.

Finally, this letter serves as the United States' renewed request for *any* defense discovery and, more specifically, notice of expert testimony by Defendant, pursuant to Federal Rule of Criminal Procedure 16. Specifically, the United States requests that you disclose to it a written summary of testimony that you intend to present at trial pursuant to Federal Rules of Evidence 702, 703, and 705. Thank you for your anticipated cooperation in this regard.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney

/s/ Linda Lane

BY: LINDA R. LANE
Assistant United States Attorney

Encl.

cc: Clerk, United States District Court (w/out encl.)
Robert Taaffe, Attorney for Defendant